

# **EXHIBIT B**

**To the**

**DECLARATION OF MICHAEL A. SCHWARTZ IN SUPPORT OF THE  
SATURN PLAINTIFFS' MEMORANDUM OF LAW IN OPPOSITON TO  
DEBTORS' OBJECTION TO PROOFS OF CLAIM NOS. 16440 and 16441**

3/1/10

**BY E-MAIL AND FIRST CLASS MAIL**

Motors Liquidation Company  
2101 Cedar Springs Road, Suite 1100  
Dallas, TX 75201  
Attn.: ADR Claims Team  
[claims@motorsliquidation.com](mailto:claims@motorsliquidation.com)

Re: **In re Motors Liquidation Company, et al. ("Debtors")**  
**Case No. 09-50026 (REG) – Capping Claim Letter**

Dear Motors Liquidation Company,

By this letter, I, the undersigned, am the below-referenced claimant, or an authorized signatory for the below-referenced claimant, and hereby submit my claim to the capping procedures established in the Order Pursuant to 11 U.S.C. § 105(a) and General Order M-390 Authorizing Implementation of Alternative Dispute Procedures, Including Mandatory Mediation (the "ADR Procedures") [Docket No. 5037] entered by the United States Bankruptcy Court for the Southern District of New York on February 23, 2010.

Accordingly, I hereby propose to cap my claim at the amount specified below (the "Claim Amount Cap").

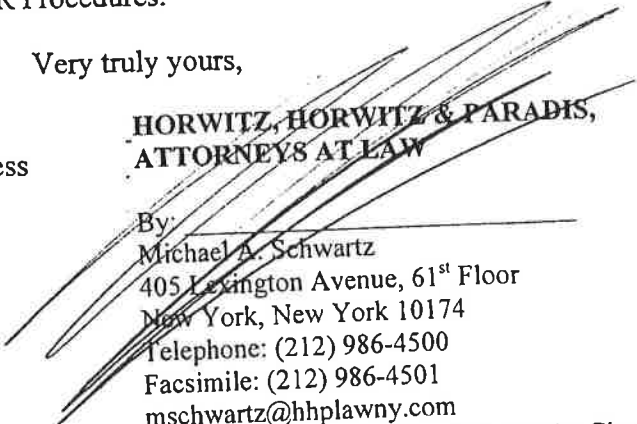
Claimant's Name	Proof of Claim No.	Original Filed Amount	Claim Amount Cap
IN RE SATURN L-SERIES TIMING CHAIN LITIGATION MDL NO 1920	16440	\$334,847,925.00	\$284,620,736

I understand and agree that the Claim Amount Cap includes all damages and relief to which I believe I am entitled, including all interest, taxes, attorney's fees, other fees, and costs. If the Claim Amount Cap is accepted by the Debtors, I understand that I am required to submit my claim to the ADR Procedures and acknowledge that my claim may be a "Designated Claim" as such term is used under the ADR Procedures.

Very truly yours,

By  
Address  
State

**HORWITZ, HORWITZ & PARADIS,  
ATTORNEYS AT LAW**

By:   
Michael A. Schwartz  
405 Lexington Avenue, 61<sup>st</sup> Floor  
New York, New York 10174  
Telephone: (212) 986-4500  
Facsimile: (212) 986-4501  
[mschwartz@hhplawny.com](mailto:mschwartz@hhplawny.com)  
Co-Lead Counsel for Plaintiffs and the Class

cc: Pablo Falabella, Esq.  
Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153  
[pablo.falabella@weil.com](mailto:pablo.falabella@weil.com)

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**HORWITZ, HORWITZ & PARADIS,  
ATTORNEYS AT LAW**

By:

Michael A. Schwartz

405 Lexington Avenue, 61<sup>st</sup> Floor  
New York, New York 10174

Telephone: (212) 986-4500

Facsimile: (212) 986-4501

[mschwartz@hhplawny.com](mailto:mschwartz@hhplawny.com)

Co-Lead Counsel for Plaintiffs and the Class

cc: Pablo Falabella, Esq.  
Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153  
[pablo.falabella@weil.com](mailto:pablo.falabella@weil.com)